



Control Number: 51415



Item Number: 447

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SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415

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APPLICATION OF SOUTHWESTERN §
ELECTRIC POWER COMPANY FOR §
AUTHORITY TO CHANGE RATES §
BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO SIERRA CLUB'S SIXTH SET OF REQUESTS FOR INFORMATION

MAY 6, 2021

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Files provided electronically on the PUC Interchange

☐ SC_6-3_Attachment_1_(Flint_Creek_UD_Results_Summary_Jan_2011_Analysis).xls
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☐ SC_6-3_Attachment_3_(Flint_Creek_UD_Results_Summary_Mar_2011_Analysis).xls
☐ SC_6-3_Attachment_4_(Flint_Creek_UD_Results_Summary_Apr_2011_Analysis).xls
☐ SC_6-3_Attachment_5_(Flint_Creek_UD_Results_Summary_May_2011_Analysis).xls
☐ SC_6-3_Attachment_6_(Fall_2011_Flint_Creek_UD_Results_Summary).xls
☐ SC_6-3_Attachment_7_(Summer_2014_UD_Results_Summary).xls
☐ SC_6-3_Attachment_8_(Summer_2015_UD_Results_Summary).xls
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☐ SC_6-3_Attachment_10_(Welsh_1and3_UD_Results_Summary_Feb_2011_Analysis).xls
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☐ SC_6-3_Attachment_19_(Summer_2015_Welsh_1and3_UD_Results_Summary).xls

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Question No. Sierra Club 6-1:

Refer to the Rebuttal Testimony of Mark A. Becker for SWEPCO ("Becker Rebuttal"). Admit that other than Flint Creek and plants located in West Virginia, American Electric Power ("AEP") has not chosen to invest in CCR and ELG compliance to operate any coal unit beyond 2028. If AEP is making such investments, identify all of the unit(s) at which the AEP has invested to comply with the CCR or ELG rules.

Response No. Sierra Club 6-1:

SWEPCO has filed an objection to this question

Prepared By: Joseph S. Perez

Title: Forecast Analyst Prin

Sponsored By: Mark A. Becker

Title: Mng Dir Res Plnning&Op Anlysis

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Question No. Sierra Club 6-2:

Refer to Becker Rebuttal. Admit that the most-recent SWEPCO IRP analyses did not study the retirement of Flint Creek before 2030. If denied, produce all such analyses and identify the retirement date(s) studied.

Response No. Sierra Club 6-2:

Confirmed. SWEPCO's most recent IRP analysis did not study the retirement of Flint Creek before 2030.

Prepared By: Joseph S. Perez

Title: Forecast Analyst Prin

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Question No. Sierra Club 6-3:

Refer to Becker Rebuttal, pages 4-6, and the discussion regarding Mr. Becker's unit disposition analysis in Docket No. 46449.

- a. State whether the referenced unit disposition analysis for Flint Creek includes any transmission cost in the retirement option?
 - i. If yes, identify the transmission costs that were assumed and the year(s) such costs were projected to be incurred.
 - ii. If yes, please identify each transmission project and the year each project costs are projected to be incurred.
 - iii. Are any of the transmission projects or costs included in the analysis required regardless of whether Flint Creek continues to operate? If yes, identify those costs.
 - iv. Has SWEPCO decided invest in any of the transmission costs included in the retirement analysis? If so, identify those projects, costs, and the year they will be incurred.
- b. State whether the referenced unit disposition analysis for Flint Creek includes any transmission cost in the retrofit option?
 - i. If yes, identify the transmission cost that was assumed and the year(s) such costs were projected to be incurred.
 - ii. If yes, please identify each transmission project and the year each project costs are projected to be incurred.
- c. For Pirkey, what was the expected end of useful life for that unit in Mr. Becker's lowest cost scenario?
- d. For Welsh, what was the expected end of useful life for that unit in Mr. Becker's lowest cost scenario?
- e. Refer to the Rebuttal Testimony of Mr. Becker at 4-6. Admit that none of these scenarios includes the cost to comply with the CCR or ELG rules.
- f. Refer to the Rebuttal Testimony of Mr. Becker at 4-6. Provide the annual outputs from all model runs associated with Flint Creek and Welsh, including generation, fuel costs, FOM, VOM, and annualized capital costs.

Response No. Sierra Club 6-3:

The Flint Creek unit disposition analyses presented in Docket No. 46449 were conducted over a number of years from 2011 to 2015 (i.e. Early 2011, Fall 2011, Summer 2014 and Summer 2015).

Early 2011 Analysis

- a. In the Early 2011 analyses, if Flint Creek was retired it was assumed that a 600 MW combined-cycle would be located at the existing Flint Creek power plant site to replace the

Flint Creek generation in order to maintain transmission system reliability in the northwest Arkansas area.

i. - iv. N/A

b. In the Early 2011 analyses, no transmission costs were assumed if Flint Creek was retrofit.

i. - ii. N/A

Fall 2011, Summer 2014 and Summer 2015 Analyses

a. In these analyses, if Flint Creek was retired it was assumed that transmission system upgrades would be required to maintain transmission system reliability in the northwest Arkansas area.

i. It was assumed that \$158 million in transmission system upgrades would be required when Flint Creek was retired by January 1, 2016.

ii. The transmission upgrades were assumed to be EHV transmission upgrades and lower voltage transmission upgrades to address local area issues.

iii. No. None of these costs were included in the analysis if Flint Creek continued to operate.

iv. No. SWEPCO has not decided to invest in any of the transmission costs included in the retirement analysis as it is their intention to continue to operate the unit.

b. In the Fall 2011, Summer 2014 and Summer 2015 analyses, no transmission costs were assumed if Flint Creek was retrofit.

c. The Pirkey unit disposition analyses provided in Docket No. 46449 were conducted over a number of years from 2011 through 2015 (i.e. Early 2011, Spring 2012, Fall 2012, Summer 2014 and Summer 2015). In all of these analyses, the retrofit and continued operation of Pirkey was the lowest cost scenario where Pirkey was assumed to operate through the end of the 2040 analysis period.

d. The Welsh 1 and 3 unit disposition analyses provided in Docket No. 46449 were conducted over a number of years from 2011 through 2015 (i.e. Early 2011, Spring 2012, Fall 2012, Summer 2013, Summer 2014 and Summer 2015). In all of these analyses, the retrofit and continued operation of Welsh 1 and 3 was the lowest cost scenario where Welsh 1 and 3 were assumed to operate through the end of the 2040 analysis period.

e. Denied. In Docket No. 46449, the unit disposition analyses that resulted in retrofitting Welsh 1&3, Pirkey and Flint Creek included CCR/ELG costs in the analyses.

f. Please see SC 6-3 Attachment 1 through Attachment 8 for the outputs for the Flint Creek unit disposition analyses conducted from 2011 to 2015. Please see SC 6-3 Attachment 9 through 19 for the Welsh 1 and 3 unit disposition analyses conducted from 2011 to 2015. All attachments are provided electronically on the PUC Interchange.

Prepared By: Joseph S. Perez

Title: Forecast Analyst Prin

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Question No. Sierra Club 6-4:

Refer to Becker Rebuttal, page 7, lines 10-13

- a. Does Mr. Becker believe it is appropriate to exclude capital costs from a going-forward analysis?
- b. Explain how capital and fixed costs are incorporated into the Company's unit disposition analysis

Response No. Sierra Club 6-4:

- a. No, it is not appropriate to exclude capital costs from a going-forward analysis. It is necessary to include the recovery of those capital costs over the expected life of the project in a going-forward analysis.
- b. The recovery of capital costs over the expected life of the project and fixed costs are incorporated into the Company's unit disposition analysis when developing the revenue requirements for the unit being evaluated.

Prepared By: Joseph S. Perez

Title: Forecast Analyst Prin

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Question No. Sierra Club 6-5:

Refer to Becker Rebuttal, page 8, lines 4-11

- a. Produce a document that supports Mr. Becker's estimate of the \$150 million for the transmission project.
- b. Is SWEPCO developing such a transmission line today? If not, why not. If yes, describe the status of such project.
- c. Does Mr. Becker believe that the transmission constraint will not exist in 2038 when Flint Creek is projected to retire? If so, explain the basis of that belief.
- d. Explain how and where the transmission cost was incorporated into the unit disposition analysis for Flint Creek.
- e. State when this transmission constraint in northwest Arkansas was first identified by the Company.
- f. Describe all actions undertaken by the Company to address the transmission constraint in Northwest Arkansas.
- g. Indicate whether the Commission in any state has ever issued any orders or instructions regarding SWEPCO's role in addressing transmission constraints in northwest Arkansas.

Response No. Sierra Club 6-5:

- a. Please see SC 6-5 Attachment 1 for the document that supports the \$150 million transmission cost assumed in the 2020 Flint Creek CCR/ELG analysis. The first solution provided in SC 6-5 Attachment 1 was deemed to be unacceptable due to the unknown hours of operation required at Mattison and the limitation on the hours of operation under the facility's air permit. See also the September 2020 Generation Retirement Study provided as Highly Sensitive Attachment 4 to SWEPCO's response to Sierra Club RFI 3-1, which is cited in footnote 76 of Ms. Glick's testimony.
- b. No. Flint Creek retirement would need to be finalized before SPP and SWEPCO would perform detailed analyses to confirm the upgrades identified by SWEPCO. SWEPCO would then undertake the project as an SPP identified, or SWEPCO sponsored upgrade.
- c. It is impossible to predict with certainty what changes will take place across the broader SPP grid between now and 2038. It is possible that transmission upgrades identified by SPP or SWEPCO to address grid reliability, modernization and integration of renewables may address this or transmission constraints. It is also possible that the area will need more reinforcements if the generation portfolio shifts in a way that the area becomes more dependent on transmission.

- d. The recovery of the transmission costs are incorporated into the Company's unit disposition analysis when developing the revenue requirements for the unit being evaluated.
- e. The transmission constraint in northwest Arkansas was first identified by the Company in the later-half of 2009.
- f. Please see the response to b.
- g. In 2005, the Arkansas Public Service Commission ordered SWEPCO to produce weekly status reports and monthly monitoring reports on how SWEPCO would keep the transmission system in NW Arkansas reliable while SWEPCO re-filed the CECPN for and constructed the Chamber Springs-Tontitown 345 kV line. This requirement was ended in 2008 when the transmission line construction was completed and the line was energized.

Prepared By: Joseph S. Perez

Title: Forecast Analyst Prin

Sponsored By: Mark A. Becker

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From: [Kamran Ali](#)
To: [Tom Brice JR.](#); [Dan Lee](#); [Kevin T Brady](#); [Clinton M Stutler](#); [Malcolm Smoak](#); [Brian Bond](#); [Matthew J Satterwhite](#); [John C Crespo](#); [Mark A Becker](#); [Jim Martin](#); [Bill Allen](#); [Melissa A Gage](#); [Eric J Wittine](#); [Monte McMahon](#); [Bill Mast](#)
Cc: [Joseph S Perez](#); [Robert W Bradish](#); [Wayman L Smith](#)
Subject: RE: Generation Update -CCR
Date: Monday, September 28, 2020 12:31:48 PM
Attachments: [image001.png](#)

Tom, Mark,

I was asked to come up with share of SWEPCo cost for Transmission mitigation. Based on some discussions and our understanding of the SPP tariff, the 345 kV line cost will only be assigned to SWEPCo since SPP does not plan the grid for N-1-1 events involving two transmission facilities. SPP does plan the grid for N-G-1 events involving a generator and a transmission facility. Since the outage that results in cascading and voltage instability in NW Arkansas is an N-1-1 event, SWEPCo will be assigned to the cost the mitigate. We do have the option to shed load after the first N-1 event to avoid cascading if and when the second contingency occurs. However, the amount of load shedding and the timing will vary based on system conditions, weather and estimated return time of impacted facility.

I had offered two solutions:

1. Mattison is brought online after the first N-1 event at full output. In this case we still have some transmission mitigation and the scope is ~\$40 million. If we select this option, SWEPCo portion will be the entire ~\$40 million. Mattison will need to run after the first N-1 event. The duration and output of the production will depend on system conditions, estimated return time of the impacted transmission facility and demand.
2. Build a ~65-Mile 345 kV line. If we decide to build the 345 kV line, SWEPCo will be responsible for the entire ~\$150 million cost.
 - a. Again, we still have the option to shed load instead of building a 345 kV line. Of course, without Mattison the magnitude of the load shed will be at least 300 MW or more which is DOE reportable.

If you would like, we can discuss our understanding that why all cost will be assigned to SWEPCo in more detail over a phone call this week or next.

Thank you!



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Question No. Sierra Club 6-6:

Refer to Becker Rebuttal, page 9. Explain why Mr. Becker assumed a Flint Creek retirement in 2027 in the CCR/ELG disposition analysis, instead of using the CCR and ELG compliance deadline(s).

Response No. Sierra Club 6-6:

SWEPCO has filed an objection to this question

Prepared By: Joseph S. Perez

Title: Forecast Analyst Prin

Sponsored By: Mark A. Becker

Title: Mng Dir Res Plnning&Op Anlysis

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Question No. Sierra Club 6-7:

Refer to Becker Rebuttal, page 10-11 regarding the Company's use of the PLEXOS model.

- a. State whether the model was allowed to endogenously retire units at any time, or if the model was only allowed to retire units on their designated retirement dates.
- b. Provide the energy efficiency cost assumptions modeled in PLEXOS.

Response No. Sierra Club 6-7:

SWEPCO has filed an objection to this question.

Prepared By: Joseph S. Perez

Title: Forecast Analyst Prin

Sponsored By: Mark A. Becker

Title: Mng Dir Res Plnning&Op Anlysis

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Question No. Sierra Club 6-8:

Refer to Becker Rebuttal, page 11 regarding unit utilization across scenarios.

- a. State whether the capacity factors for each unit varied across scenarios.
- b. Provide the annual capacity factors for each of the Company's fossil units for all scenarios.

Response No. Sierra Club 6-8:

SWEPCO has filed an objection to this question

Prepared By: Joseph S. Perez

Title: Forecast Analyst Prin

Sponsored By: Mark A. Becker

Title: Mng Dir Res Plnning&Op Anlysis

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Question No. Sierra Club 6-9:

Refer to Becker Rebuttal, pages 12-13 regarding the Company's modeling of solar PV and battery storage.

- a. State where in the modeling output files battery storage appears.
- b. State the size (MW) and duration (MWh) of the battery storage resource available to the model.
- c. Provide the cost by year for battery storage as modeled by the Company.
- d. State whether the Company modeled paired battery storage and solar PV resources.
 - i. If yes, provide the size and output of each resource, and the resource per year.
 - ii. If no, explain why paired battery storage was not modeled.
- e. Provide the ELCC applied to solar for each year of the study period in native format or Excel.

Response No. Sierra Club 6-9:

SWEPCO has filed an objection to this question

Prepared By: Joseph S. Perez

Title: Forecast Analyst Prin

Sponsored By: Mark A. Becker

Title: Mng Dir Res Plnning&Op Anlysis

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Question No. Sierra Club 6-10:

Refer to the Rebuttal Testimony of Monte A. McMahon for SWEPCO ("McMahon Rebuttal").

- a. Because SWEPCO has decided to install a dry coal ash handling system at Flint Creek, has the Company reduced O&M expenses for the wet ash handling systems currently in use?
 - i. If yes, state the amount of such savings and the date(s) on which SWEPCO reduced spending on those systems.
 - ii. If not, explain why SWEPCO has not reduced O&M for systems to be retired during 2021.
- b. Because SWEPCO has decided to install a dry coal ash handling system at Flint Creek, has the Company reduced capital maintenance expenses for the wet ash handling systems currently in use?
 - i. If yes, state the amount of such savings and the date(s) on which SWEPCO reduced spending on those systems.
 - ii. If not, explain why SWEPCO has not reduced O&M for systems to be retired during 2021.

Response No. Sierra Club 6-10:

- a-b: The Company has not reduced capital and O&M spending on the Flint Creek wet ash handling system, which is scheduled to remain in service until November of 2022. This timeline is based on the Flint Creek CCR/ELG project completion date of February 28, 2023, provided by the Company in Sierra Club 2-17 Attachment 3.

Prepared By: Frances K. Bourland

Title: Regulatory Acctg Case Mgr

Prepared By: Tara D. Beske

Title: Resource Planning Anlyst Staff

Prepared By: Tiffany A. Powell Day

Title: Regulatory Acctg Case Mgr

Sponsored By: Michael A. Baird

Title: Mng Dir Acctng Policy & Rsrch

Sponsored By: Monte A. McMahon

Title: VP Generating Assets SWEPCO

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Question No. Sierra Club 6-11:

McMahon Rebuttal, page 7.

- a. Provide the Company's current best estimate or when it expects to have sufficient information to perform the disposition analysis for post-coal burning operations at Welsh

Response No. Sierra Club 6-11:

As discussed on page 7 of Company witness McMahon's rebuttal testimony, many factors could influence the outcome of the Company's decision regarding the disposition of the Welsh units between now and 2028. At this time, the Company does not have a more specific estimate than "as 2028 approaches".

Prepared By: Tara D. Beske

Title: Resource Planning Analyst Staff

Sponsored By: Monte A. McMahon

Title: VP Generating Assets SWEPCO

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Question No. Sierra Club 6-12:

Refer to the Rebuttal Testimony of Jason M. Stegall for SWEPCO ("Stegall Rebuttal"), page 3.

- a. Is Mr. Stegall a member of the Commercial Operations Group?
- b. If not, what basis does he have to testify about the activities of this Group.

Response No. Sierra Club 6-12:

Mr. Stegall is not a member of the AEP Service Corporation Commercial Operations organization; however, he has 24 years of experience at the AEP Service Corporation supporting the AEP utility operating companies and briefly describes his current role supporting the Commercial Operations organization on Page 2, Lines 3 - 6 of his rebuttal testimony. Furthermore, Mr. Stegall has provided testimony and discovery responses in support of the activities of the Commercial Operations organization in other AEP jurisdictions (Michigan, Kentucky). He also regularly participates in meetings with both members and management of the Commercial Operations organization.

Prepared By: Scott E. Mertz

Title: Regulatory Consultant Staff

Sponsored By: Jason M. Stegall

Title: Reg Pricing & Analysis Mgr

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Question No. Sierra Club 6-13:

Refer Stegall Rebuttal, page 4.

- a. Does Mr. Stegall believe the unit dispatch and resource planning require identical analysis?
- b. If not, why does he discuss unit dispatch in his testimony? If yes, explain why these analyses are identical.

Response No. Sierra Club 6-13:

- a. No.
- b. Mr. Stegall discusses unit dispatch in response to the claims by Sierra Club witness Glick that the Company's Welsh and Flint Creek units incurred net losses in in years prior to, and including, the test year.

Prepared By: Scott E. Mertz

Title: Regulatory Consultant Staff

Sponsored By: Jason M. Stegall

Title: Reg Pricing & Analysis Mgr

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Question No. Sierra Club 6-14:

Refer Stegall Rebuttal, page 4, lines 11-13.

- a. Produce, in native format, the referenced analysis that Welsh 1&3 and Flint Creek produced \$196 million in revenues exceeding variable costs.
- b. Produce, in native format, all inputs for such calculations.

Response No. Sierra Club 6-14:

Please see SC 6-14 CONFIDENTIAL Attachment 1 for the requested information.

The attachment responsive to this request is CONFIDENTIAL MATERIAL under the terms of the Protective Order. Due to current restrictions associated with COVID-19, this information is being provided electronically and a secure login to access the information will be provided upon request to individuals who have signed the Protective Order Certification.

Prepared By: Scott E. Mertz

Title: Regulatory Consultant Staff

Sponsored By: Jason M. Stegall

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Question No. Sierra Club 6-15:

Refer Stegall Rebuttal, page 6, and the referenced net revenues calculations.

- a. Produce, in native format, the referenced net revenue calculations.
- b. Produce, in native format, all inputs for such calculations.

Response No. Sierra Club 6-15:

Please see the Company's response to SC 6-14.

Prepared By: Scott E. Mertz

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